

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-V.-

DANIEL B. KARRON
Defendant

07-cr-0541

Notice of MOTION to vacate and for
discovery by Rule 60(b)(4),
60(b)(5), 18 USC § 3613(c) and
Rule 16

PLEASE TAKE NOTICE that the Defendant DANIEL B. KARRON, petitioning *pro se* at this time, requests an order of this court:

1. to issue an order to vacate the nullified original Judgment entered in money judgment book as #08,1970 as to Daniel B. KARRON in the amount of \$ 125,100.00 by application of Rule 60(b)(4).
2. to issue an order to set aside the imperfect dependent lien against myself and my property as prescribed by Rule 60(b)(5) and 18 U.S. Code § 3613(c)
3. to issue an order authorizing the defendant to conduct Discovery under Rule 16.

This action is not procedurally time barred by Rule 60(c)(1).

The additionally submitted documents consisting of 1) sworn declaration of KARRON, as the Defendant, 2) the memorandum of law, and 3) the proposed stipulation of agreed facts to be negotiated and to be signed by the government, are offered to the court in support of this motion for the orders requested.

Signed



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